

**MARTIN GEDULDIG**

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May 21, 2019

Hon. Joseph F. Bianco  
United States District Judge  
100 Federal Plaza  
Central Islip, New York 11722

Re: United States vs. Ronald DeRisi  
Docket No. 19 CA 090 (JFB)

Dear Judge Bianco:

My office represents Ronald DeRisi, the above captioned defendant. I am writing in response to the Addendum To The Presentence Report recently submitted by the Probation Department. I am in agreement with the factual findings contained in the Addendum, but do not want this letter to be taken as a rejection of the stipulations contained in the plea agreement which I signed along with my client. There is no question that DeRisi was in possession of ammunition and made a number of specific, threatening telephone calls. This conduct was taken as evidence of an intent to carry out his threats.

I submit other facts existing in this case, fully explained by the Probation Department, support a defense argument for a sentence of "time served". Such a sentence would be significantly lower than the guideline range set forth in the plea agreement.

Among those other factors, the Probation Department's Addendum notes DeRisi's "physical infirmity, which made it virtually impossible for him to carry out his threats. Additionally, there are several consistent psychological reports,

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prepared over a period of years, which confirm my client's diminishing brain functions.

It is the hope of my client and his family that his sentencing can proceed on May 31, 2019. He does not seek to vacate his plea agreement and hopes no other proceedings will be necessary. We respectfully request that a sentence of "time served" be imposed. Thank you for your consideration.

Yours truly,

A handwritten signature in black ink, appearing to read "Martin Geduldig".

Martin Geduldig

cc: AUSA Justina Geraci  
Jared Maneggio, USPO